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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

OCT 21 1996

In the Matter of

The Development of Operational,  
Technical, and Spectrum  
Requirements for Meeting  
Federal, State and Local Public  
Safety Agency Communication  
Requirements Through the year 2010

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

WT Docket No. 96-86

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To: The Commission

**COMMENTS OF THE AMERICAN AUTOMOBILE ASSOCIATION**

The American Automobile Association ("AAA"), by its attorneys, submits the following comments in the Notice of Proposed Rule Making in the above-captioned proceeding.

AAA, and its affiliates, operate an extensive fleet of emergency road service vehicles providing emergency roadside assistance to motorists throughout the country. Because of the danger to the motorist stranded on a busy highway, little traveled back road, or high crime area, some AAA clubs and affiliates are even tied into the local 911 system for emergency calls. AAA is also the FCC-recognized frequency coordinator for the Automobile Emergency Radio Service.

AAA's radio operations are designed to provide a nationwide safety net, allowing its automobile emergency road service to rescue stranded motorists from hazardous situations and to remove dangerous conditions created by accidents and mechanical breakdowns which could lead to additional injuries. Its radios are used solely for this safety function, which furthers the goals enunciated in Section 1 of the Communications Act of 1934, as amended. The safety related operation of these radios prevents injury to motorists who break down in sub-zero

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weather or in dangerous neighborhoods, to other drivers who may run into a stalled or broken down car on the freeway, and to small children who are accidentally locked in their parents' car. These services directly relieve federal, state and local public safety agencies of the burden of responding to these hazardous situations. If quasi-public safety entities like AAA do not have continued access to usable spectrum for their operations, these burdens will fall once again on financially strapped government agencies, creating a greater need for public safety radio spectrum (or in some cases resulting in a net loss of these important services).

AAA submits that in considering the future requirements for the public safety services, the Commission should reconsider what constitutes "public safety." The Commission should look at the functions that are performed, rather than whether the entity performing those functions is a public entity or a private entity. As budget shortfalls limit the services that state and local governments may provide, the private sector increasingly will be required to fill the gap in providing safety and security to the public.

AAA has always believed that its emergency road service operations should more properly be classified as public safety. But heretofore the Commission's regulations have only provided for licensing of state and other local governmental entities in the public safety radio services.

AAA accordingly supports the proposal to expand the definition of public safety to include a "Public Service" eligibility classification. This definition would include eligibility for non-public safety entities that furnish, maintain, and protect the nation's basic infrastructures which are required to promote the public's safety and welfare. The emergency road services provided by AAA fall squarely within this definition of "public service."


AAA also wants to make clear that it does not seek access to the channels that are currently allocated to the public safety services. AAA simply requests that the channels that have been reserved for emergency road service operations in the Automobile Emergency Radio Service, as well the new interstitial narrow band channels recently allocated for the same purpose by the Commission's PR Docket 92-235 refarming proceeding, be moved to the Public Safety Radio Services. Similarly, AAA does not propose that its dedicated channels be made available to other public safety agencies on a routine basis. However, it does not object to use of its channels for direct communication with police and rescue organizations when necessary for mutual cooperation.

But clearly there are situations where direct communication between emergency road service vehicles and police and fire agencies and rescue squads may save lives or reduce property damage. In those situations, common frequencies for communication between emergency road service vehicles and other public safety agencies would be useful. AAA supports the Commission proposal to make new channels available specifically for mutual aid

purposes among all public safety eligibles so that all personnel providing safety of life and property may have common channels for immediate communication in the event of emergencies.

Respectfully submitted,

American Automobile Association

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